

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**  
**Chapter 13 Standing Trustee**

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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

IN RE:  
LOURDE MONCION-ANORVE

**Case No.: 20-21757VFP**

**HEARING DATE: 12/17/2020**

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**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee by way of objection to the Debtor's proposed plan respectfully objects as follows:

- Debtor has failed to list all assets or income in violation of 11 U.S.C. Sections 521(a)(1)(B)(i) and 521(a)(1)(B)(ii).  
Specifically, Schedule A fails to list the value of Adams Ave consistent with CMA supplied.
- The plan provides for payment on unsecured claims of less than that which would be distributed upon liquidation under Chapter 7, as prohibited by 11 U.S.C. Section 1325(a)(4).  
Specifically, Combined equity in the properties requires a 100% plan.
- Debtor has failed to provide proof of income.  
The debtor has failed to provide proof of current income. A paystub from debtor's employer dated no later than two weeks prior to the 341 date must be submitted.
- Debtor(s) failed to meet the requirements of 521(e)(2)(A)(i), in that the debtor(s) failed to produce a copy of the most recently filed pre-petition tax return or transcript thereof.

WHEREFORE, Marie-Ann Greenberg, the Chapter 13 Standing Trustee prays that confirmation of the Debtor's Chapter 13 plan in its present form be denied and the case be dismissed.

Dated: November 17, 2020

By: /s/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee